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Attorneys for Defendant
ALCLEAR, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

BENNY MURRAY II, as an individual
on behalf of himself and on behalf of all
others similarly situated,

Plaintiff,

vs.

ALCLEAR, LLC, Delaware limited
liability company; and DOES 1-100,
inclusive,

Defendants.

Case No.: 2:23-cv-3051

**DECLARATION OF CECILIA N.
KWOK IN SUPPORT OF
DEFENDANT ALCLEAR, LLC'S
NOTICE OF REMOVAL**

(Filed concurrently with Notice of
Removal; Declarations of Eric J. Gitig and
Matthew Levine; Civil Case Cover Sheet;
Notice of Interested Parties; and Corporate
Disclosure Statement)

Complaint Filed: February 17, 2023

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DECLARATION OF CECILIA N. KWOK

I, CECILIA N. KWOK, declare as follows:

1. I am over the age of 18 and competent to testify. The following facts are based on my personal knowledge or based on my personal review of records kept in the course of regularly conducted business activities by Defendant ALCLEAR, LLC (“Defendant”), and if called as a witness, I can and will competently testify hereto. I submit this declaration in support of Defendant’s Notice of Removal.

2. I am currently the Payroll Manager for Defendant. As the Payroll Manager for Defendant, I have knowledge of Defendant’s scheduling practices in California and have access to records of Defendant’s current and former California employees that are created, maintained, regularly updated, and kept by Defendant in the regular and ordinary course of business.

3. Based on my role as the Payroll Manager for Defendant, I have access to the records of Plaintiff BENNY MURRAY II (“Plaintiff”). Based on my review of Plaintiff’s records, which were created, maintained, and kept by Defendant in the regular and ordinary course of business, I have personal knowledge that Plaintiff’s residential address was located in Los Angeles, California at the conclusion of his employment with Defendant.

4. Based on my role as the Payroll Manager for Defendant, I have access to the records of individuals who are or were employed by Defendant as non-exempt employees in the state of California. In connection with this declaration, I reviewed records for individuals who are or were employed by Defendant as non-exempt employees in the State of California between February 17, 2022 and February 24, 2023, which were created, maintained, and kept by Defendant in the regular and ordinary course of business.

5. Based on my role as the Payroll Manager for Defendant, my personal knowledge and my review of the above-referenced records, I am aware that Defendant has employed at least 884 non-exempt employees in the State of California between February 17, 2022 and February 24, 2023, and that Defendant typically hired and scheduled these employees to work five days per week.

1 6. Based on my role as the Payroll Manager for Defendant, my personal
2 knowledge and my review of the above-referenced records, I am aware that Defendant's
3 non-exempt employees in the State of California collectively worked over 22,000
4 workweeks between February 17, 2022 and February 24, 2023.

5 7. Based on my role as the Payroll Manager for Defendant, my personal
6 knowledge and my review of the above-referenced records, I am aware that Defendant
7 employed over 884 non-exempt employees in the state of California who received
8 biweekly wage statements between February 17, 2022 and February 24, 2023, and that
9 these employees collectively received over 11,400 wage statements during this period.

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11 I declare under penalty of perjury under the laws of the States of California and New
12 York and the United States of America that the foregoing is true and correct.

13 Executed this 21 day of April, 2023, at New York, New York.

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17 CECILIA N. KWOK
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